

**FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of

Notice of Proposed Rulemaking

Universal Service Contribution
Methodology

FCC 19-46

WC Docket No. 06-122

COMMENTS ON THE PROPOSED UNIVERSAL SERVICE FUND CAP CHANGES

Background

The Commission for Educational Technology is empowered by the General Assembly through [CGS § 61a](#) to envision, coordinate, and oversee the management and successful integration of technology in Connecticut's schools, libraries, colleges, and universities. The Commission also oversees the Connecticut Education Network (CEN), which connects every district and nearly every library to the Internet. As part of its [responsibilities](#) as the state's principal educational technology adviser, it designs and stewards the [State Educational Technology Goals and Plan](#) that helps ensure equity of access to technology-based learning solutions. The State Plan includes an initiative to maximize the use of E-rate by Connecticut's schools and libraries. The following comments reflect the Commission membership's stand on the proposed changes, informed by information and data shared through the recent report, "E-rate in Connecticut: Survey Results and Opportunities for Schools and Libraries"¹

Comments

The Federal Communications Commission (FCC) released May 31 a [Notice of Proposed Rulemaking](#) (NPRM) that the Commission opposes. Among other changes, the NPRM would

¹ <http://bit.ly/CT-Erate> or <https://portal.ct.gov/DAS/CTEdTech/Commission-for-Educational-Technology/Initiatives/E-rate>.

combine the caps of two disparate programs, E-rate (schools and libraries) and Rural Healthcare, which currently have separate, unmet funding caps. The proposed combined cap would pit two programs that serve different purposes and audiences against each other, competing for the same combined allocation of funds. If the FCC has interest in “simplifying applications for program support and lowering the costs for participating members” (NPRM p. 9), including all of Connecticut schools and libraries, then it should focus efforts on streamlining the use of E-rate. The complexity and inefficiency of filing for E-rate have had the consequence of dampening measured use of, and demand for, funding. In Connecticut’s case, the state has seen \$22M in unused Category 2 funds among schools alone².

In response to the FCC’s request for “information and data related to the economic efficiency costs” of the E-rate program (NPRM p. 9), we share results published in the Commission’s recent report, “[E-rate in Connecticut](#)”:

- Longitudinal and Experienced Perspectives: Responses from schools reflect those with a history of using E-rate, with more than 75% filing each year for at least the past 6 years, more than half for the entire length of the program since its inception in 1997 (“E-rate in Connecticut,” p. 6).
- Impediments to Efficiencies: This experience would indicate that school leaders would “master” E-rate program management and not need outside assistance. This is not the case, with only 11% felt comfortable managing the program on their own (“E-rate in Connecticut,” p. 8). Comments from seasoned technology directors about the program point to their ongoing frustration with its complexity and inefficiency:
 - “[There is a need for] a more streamlined process, I couldn't handle the application without the help of a consultant. I don't know what makes it so difficult, but even with the help of a consultant it takes a lot of my time.
 - “Requirements and criteria have become so overwhelming that the application process seems prohibitive at best.”

² USAC Form 471 2018 E-rate applications, n=153 of 162 school districts, n=836 of 873 schools, n=469,996 of 495,458 students; <http://stateofthestates.educationsuperhighway.org/?postalCd=CT#state>.

- “Some of the wording of questions is misleading. I always have to call support.”
- “There must be a better way to encourage the use of technology without the burden of having to fill out more paperwork!”
- Indirect Costs: On average, districts spend 27 hours per year managing the E-rate program, in addition to their need to pay for outside consulting time (“E-rate in Connecticut,” p. 16).
- Direct Costs: Nearly $\frac{3}{4}$ of Connecticut schools use an outside consultant, at an average reported cost of \$6,322.24, or \$2.70 per student (“E-rate in Connecticut,” p. 19).
- Opportunities for Improvement: The Commission echoes the following recommendations from Connecticut’s school leaders:
 - “Make Appian / USAC portal easier to understand for newcomers. It is obvious that Appian was the lowest bidder because the portal is a "generic" process software that has not been customized enough for the needs of the e-rate process. Yes, every year it gets better, but it is not intuitive and menu items are hidden in reports and workarounds.”
 - “Make the filing simpler and easier to do ourselves. More districts would save the [external consulting] funds and have their Business Offices complete the process if they understood the process better.”

We urge you not to move forward with the aforementioned rulemaking and instead focus efforts on the above and other approaches to streamlining the Universal Service programs.

Respectfully submitted,

Mark Raymond

Chief Information Officer, State of Connecticut

Chair, Connecticut Commission for Educational Technology